

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

IN RE: HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**[PROPOSED] ORDER GRANTING  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF PLAINTIFFS'  
OPPOSITION TO DEFENDANTS'  
JOINT ADMINISTRATIVE MOTION  
TO SUPPLEMENT THE RECORD AND  
DECLARATION OF EDWARD E.  
LEAMER IN OPPOSITION TO  
DEFENDANTS' ADMINISTRATIVE  
MOTION**

On January 14, 2013, Plaintiffs filed an Administrative Motion to Seal, Pursuant to Civil Local Rule 79-5(d), Portions of Plaintiffs' Opposition to Defendants' Joint Administrative Motion to Supplement the Record and the Declaration of Dr. Edward E. Leamer in Opposition to Defendants' Administrative Motion ("Motion to Seal") (Dkt. 271), and lodged under seal certain information contained in:

- (i) Plaintiffs' Opposition to Defendants' Joint Administrative Motion for Leave to Supplement the Record in Support of Their Opposition to the Motion for Class Certification and Motion to Strike Dr. Leamer's Expert Report ("Plaintiffs' Opposition to Motion for Leave to Supplement") (Dkt. 270); and
- (ii) The Declaration of Dr. Edward E. Leamer in Opposition to Defendants' Administrative Motion ("Leamer Opposition Declaration") and Exhibit A thereto (Dkt. 270-1).

Defendants designated this information "Confidential" or "Confidential – Attorneys-Eyes Only" under the Stipulated Protective Order (Modified by the Court) (Dkt. 107).

On January 22, 2013, Defendants filed Declarations in Support of Plaintiffs' Motion to Seal pursuant to Civil Local Rule 79-5(d), as follows:

Defendant Apple Inc. filed a Declaration of Christina Brown;  
 Defendant Intel Corp. filed a Declaration of Frank Busch; and  
 Defendant Intuit Inc. filed a Declaration of Catherine Zeng.

GOOD CAUSE HAVING BEEN SHOWN, THE COURT HEREBY ORDERS that the following documents, figures, and portions thereof be filed under seal:

- 1. The following portions of Plaintiffs' Opposition to Motion for Leave to Supplement (Dkt. 270): page 3: 1-2 and 5: 2-11;
- 2. Exhibit A of the Leamer Opposition Declaration (Dkt. 270-1) in its entirety.

**IT IS SO ORDERED.**

Date: \_\_\_\_\_

\_\_\_\_\_  
 HONORABLE LUCY H. KOH  
 United States District Court Judge